

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In Re:

Neelam Taneja,
Debtor.

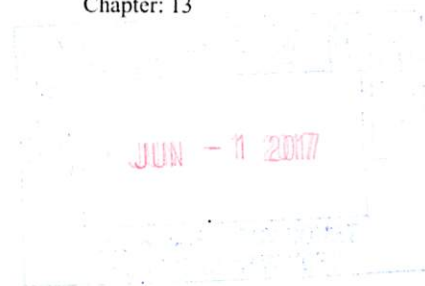
Case No.: 17

Chapter: 13

v.

George Indest, et al

_____ /



ANSWER AND OBJECTION TO SUMMARY JUDGEMENT

Comes now, Defendant, Neelam Uppal files an objection to new summary motion filed by Creditor, George Indest, after being served with the 'Notice of Bankruptcy' and Defendant relies on variety of grounds in support of submission

1. The case is under Automatic stay of a new bankruptcy.
2. The Creditors, after being served with the notice of new Bankruptcy, as willful violation of the automatic Stay, fraud and corruption and conspiracy are obtaining such an order to enforce debt.
3. The Creditor already took the money, \$9000.00 as retainer for one pleading..
4. The Creditor has fabricated bill after termination since 2012.
5. This court has Jurisdiction pending Bankruptcy. The Creditor has not obtained relief under this bankruptcy.
6. Creditor's Judgment is invalid pursuant to F.S 1540 as it was obtained by fraudulent means by producing fake orders.
7. The creditor owes damages for automatic stay violation

8. There is dispute over " material facts".
8. Creditor's actions constitute severe Harrasment to the Debtor. See exhibits
9. Wherefore, the debtor requests that the Automatic stay be enforced under 11 U.S.C 362 and that creditor's motion for Summary Judgement be denied and quashed and an injunction be entered against the creditor and Pinellas County Court for any judgement.

Debtor relies on previous filings and Exhibits.

Respectfully submitted

NEELAM UPPAL, PRO SE

DECLARATION

The undersigned Debtor named in the foregoing Motion to Continue Automatic Stay as to All Creditor hereby makes a solemn oath that thatements contained here are true and correct to the best of the Debtor's knowlwdge, information and belief.

Respectfully submitted,

Date: 5/27/17

N. Upal

Neelam Taneja, Debtor *Pro se*.

**1370 Broadway, #504
NEW YORK, NY-10018
PH.- (646)-740-9141**

CERTIFICATION

This is to certify that a true copy has been sent to:
Barry Wilkinson, 696 1st ave, suite 201, St. Petersburg, FL-33701
& PO box 8102, Madiera Beach, FL

Neelam Uppal
PO box 1002,
Largo, FL 33779
727-403-0022

NEELAM UPPAL, Pro se.
17715 Gulf Blvd., #705
REDDINGTON SHORES, FL-33782
PH.- (727)-403-0022

**UNITED STATES BANKRUPTCY COURT OF APPEALS
SOUTHERN DISTRICT OF NEW YORK**

In Re:

**Neelam T. Uppal,
Debtor.**

**Case No.:16-12356-jlg
Chapter: 13**

v.

George Indest, et al

_____ /

ANSWER TO CREDITOR, GEORGE INDEST'S OBJECTION

Debtor, Neelam Taneja, hereby, files an Answer to this falsely derogatory pleading by Mr. Indest.

And in support of her pleading states grounds as follows:

1. It is Mr. Indest , who is filing False and frivolous motion and constitutes Creditor's misbehavior.
2. Mr. Indest's objection is untimely.
3. Mr. Indest's application is in violation of the pre-requisites set by Rule 9011.
4. Mr. Indest is intentionally making false statements in an effort to trick this court by deception.

INTRODUCTION:

Mr. Indest is known to exploit doctors in Florida. See attached.

1. Mr. Indest is one of the main Florida's Mastermind for Legal Conspiracy

BACKGROUND:

2. Mr. George Indest, the attorney of Healthlaw firm, fabricated a bill after he was paid a retainer of \$9000.00 for one pleading. He first filed a claim for bill of about \$22,000 approx. to the bankruptcy court and then obtained Judgement from the trial court Judge for \$65,894.00 fraudulent bill based on summary Judgement.
3. The defendant filed an appeal and a complaint to the Florida bar.
4. The Florida bar rejected to help the defendant by making senseless excuses that they would not do anything to disallow the Fraudulant bill because I had filed divorce and bankruptcy lawsuits and further, that it was my fault that the Seminole County Judge did not allow a trial. Even though, the debtor had appealed that and the Fifth District Appellate court entered this order during the pendency of this bankruptcy case, to sanction the debtor for filing the appeal

STATEMENT OF FACTS:

According the Bankruptcy rules, the debtor has to notify the Creditor and it is the creditor's responsibility to stop all legal and other collection actions.

Even then the debtor notified the Seminole County courthouse.

The Appellate court did not rule on any other issues except the motion for sanction . Giving the benefit of doubt, the debtor filed a motion for reconsideratio,. Mr. Indest vheemently argued to ignore the STAY. See attached, The Appellate court unconditionally supported Mr. Indest. The Supreme Court of Florida has allowed Writ of Mandanamus.

MEMORANDUM OF LAW

Rule 9011 (C) (1) (a)

The motion for sanctions may not be filed with or presented to the court unless, within 21 days after service of the motion (or such other period as the court may prescribe), the challenged paper, claim, defense, contention, allegation, or denial is not withdrawn or appropriately corrected, except that this limitation shall not apply if the conduct alleged is the filing of a petition in violation of subdivision (b). If warranted, the court may award to the party prevailing on the motion the reasonable expenses and attorney's fees incurred in presenting or opposing the motion. Absent exceptional circumstances, a law firm shall be held jointly responsible for violations committed by its partners, associates, and employees.

18 U.S. Code § 1001

(a) Except as otherwise provided in this section, whoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully—

- (1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact;
- (2) makes any materially false, fictitious, or fraudulent statement or representation; or
- (3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry;

shall be fined under this title, imprisoned not more than 5 years or, if the offense involves international or domestic terrorism (as defined in section 2331), imprisoned not more than 8 years, or both. If the matter relates to an offense under chapter 109A, 109B, 110, or 117, or section 1591, then the term of imprisonment imposed under this section shall be not more than 8 years.

(b) Subsection (a) does not apply to a party to a judicial proceeding, or that party's counsel, for statements, representations, writings or documents submitted by such party or counsel to a judge or magistrate in that proceeding.

(c) With respect to any matter within the jurisdiction of the legislative branch, subsection (a) shall apply only to—

(1) administrative matters, including a claim for payment, a matter related to the procurement of property or services, personnel or employment practices, or support services, or a document required by law, rule, or regulation to be submitted to the Congress or any office or officer within the legislative branch; or

(2) any investigation or review, conducted pursuant to the authority of any committee, subcommittee, commission or office of the Congress, consistent with applicable rules of the House or Senate.

(June 25, 1948, ch. 645, 62 Stat. 749; Pub. L. 103-322, title XXXIII, § 330016(1)(L), Sept. 13, 1994, 108 Stat. 2147; Pub. L. 104-292, § 2, Oct. 11, 1996, 110 Stat. 3459; Pub. L. 108-458, title VI, § 6703(a), Dec. 17, 2004, 118 Stat. 3766; Pub. L. 109-248, title I, § 141(c), July 27, 2006, 120 Stat. 603

CONCLUSION:

Debtor's motion is in good faith.

RELIEF SOUGHT : It is Mr. Indest who should be sanctioned for this

frivolous motion as he has clearly violated the Automatic stay and urged the

Appellate court to do so.

Further, he is liable under 18 USC sec. 1001 in filing false claims and now

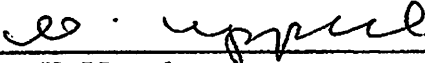
falsely writing derogatory things about the debtor to trick and deceive this

court as a tortuous interference. WHEREFORE, Debtor respectfully requests this Court to entry of an order granting this MOTION , and granting such other and further relief as to this Court is deemed proper and just.

DECLARATION

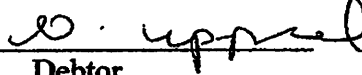
The undersigned Debtor named in the foregoing Motion hereby makes solemn oath that the statements and figures contained herein are true and correct to the best of the Debtors knowledge, information and belief.

Date:



Neelam T. Uppal

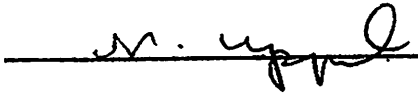
Respectfully submitted on this th day of 12/27/2016.



Debtor
NEELAM UPPAL, Pro se.
7352 Sawgrass pt. Dr
PINELLAS PARK, FL-33782
PH.- (727)-403-0022

AFFIDAVIT OF SERVICE

The foregoing pleading has been on 12/27/16 served by



NEELAM UPPAL, PRO, SE
P.O BOX 1002.
LARGO, FL-33779
PH. - (727)-403-0022
E-mail-

TO:

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been
served by

on 27 day of ^{December} ~~September~~, 2016 to:

Dated 5/30, 2017


NEELAM UPPAL, PRO, SE
1370 Broadway, # 504
New York, NY -10018
PH. - (646)-740-9141
E-mail- nneelu123@aol.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served
by

on _ day of 5/30, 2017 to:


TO: all Creditor via email or USPS mail